

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11
:
LEHMAN BROTHERS HOLDINGS INC, *et al.*, : Case No. 08-13555 (JMP)
: (Jointly Administered)
Debtors. :
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**NOTICE OF INTENT TO PARTICIPATE IN
DISCOVERY RELATED TO PLAN CONFIRMATION**

NOTICE IS HEREBY GIVEN that Aozora Bank, Ltd., represented by Alston & Bird LLP, has filed Claims Numbers 13903, 13907, and 15627 against Lehman Brothers Holdings, Inc. and Lehman Brothers Special Financing, Inc., in an aggregate amount in excess of \$500,000,000.00 and a party of interest in the above-captioned chapter 11 cases (the "Chapter 11 Cases") on the basis that it is a creditor of more than one of the above-captioned debtors.

ACCORDINGLY, PLEASE TAKE FURTHER NOTICE that, subject to any objections by the Debtors or the Statutory Committee of Unsecured Creditors appointed in the Chapter 11 Cases and/or any limitations imposed by the Court, the above-named party in interest and its counsel intends to participate as follows in Plan Discovery, as defined in the Order Establishing Procedures in Connection with Discovery Related to Plan Confirmation and Other Issues entered by the Court on April 14, 2011 [Docket No. 16003].

Dated: April 28, 2011

/s William S. Sugden

Contact Information for Party in Interest:

Aozora Bank, Ltd.
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Contact Information for Advisors for Party in Interest:

Not Applicable.

Designation of Contact(s) to Receive Any Notice(s) Required Under the Order:

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Group that Participant elects to join (pursuant to Paragraph 3(b) of the Order):Join Group
Pursuant to Paragraph 3(b) of the Order, Aozora elects to join Group 3(b)(iii) as the Debtors
against whom Aozora asserts claims are guarantee creditors of LBHI for which a non-U.S.
affiliate is the primary obligor (other than holders of Lehman Programs Securities (as defined in
the Disclosure Statement)).